

Exhibit A



Mayer Brown LLP
1221 Avenue of the Americas
New York, New York 10020-1001

Main Tel +1 212 506 2500
Main Fax +1 212 262 1910
www.mayerbrown.com

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Paul Monteleoni, Esq.
Benet Kearney, Esq.
Doug Zolkind, Esq.
Assistant United States Attorneys
United States Attorney's Office
One Saint Andrew's Plaza
New York, NY 10007

Daniel L. Stein
Direct Tel +1 212 506 2646
Direct Fax +1 212 849 5573
dstein@mayerbrown.com

DELIVERY BY EMAIL

**Re: *United States v. Stephen Calk,*
19 Cr. 366 (LGS)**

Counsel:

We write to follow up on our recent conversation concerning the Government's anticipated production of documents and materials to Mr. Calk, pursuant to Federal Rule of Criminal Procedure 16 and the United States Constitution.

During our conversation, among other things, you disclosed that your Office had received approximately two terabytes of data from the Office of Special Counsel Robert Mueller pertaining to that office's investigation and prosecution of Paul Manafort (the "Manafort Data"). You stated that you intended to review the Manafort Data to identify material that is discoverable in this matter, including any material discoverable under *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny.

To assist your Office with its review of the Manafort Data, we are providing this letter to set forth certain categories of materials we expect may be contained within the Manafort Data, which we would consider *Brady* material, as described above. The below list is intended merely to be illustrative, and should not be taken to constitute the only categories of such information:

- All documents or communications involving, referring to, or otherwise relating in any way to Mr. Calk, the Federal Savings Bank (the "Bank"), and/or any of its directors, officers, employees, or agents;
- All documents or communications concerning any loan for which Mr. Manafort and/or Mr. Yohai applied, successfully or unsuccessfully, during the time period covered by the Indictment, *i.e.*, from in or about July 2016 up to and including January 2017, including, in particular, each of the loans identified in the Indictment;

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- All documents or communications concerning any properties owned, rented, or otherwise controlled by Mr. Manafort, Mr. Yohai, or any entity in which one or both of them held an ownership interest;
- All documents or communications reflecting Mr. Manafort's commission of the offense of bank fraud and/or other offenses investigated or considered by the Government, including any exhibits presented at Mr. Manafort's trial; and
- All documents or communications concerning President-Elect Trump's transition, including but not limited to documents or communications reflecting Mr. Manafort's participation or involvement, whether formal or informal, in such transition, particularly communications with Mr. Manafort concerning any potential candidates for positions in the Trump Administration.

Whether or not included in the Manafort Data, we further expect that any and all notes, memoranda, or other records related to statements made by individuals, whether to the Special Counsel's Office and/or to the Government, that are subject to the Government's obligations under *Brady*, *Giglio*, and their progeny will be produced to Mr. Calk promptly as well. To that end, we note that Judge Schofield's Individual Rules provide that the Government's obligation to timely produce material pursuant to those precedents "appl[ies] regardless of whether the *Brady* Material and *Giglio* Material also happen to be producible pursuant to the Federal Rules of Criminal Procedure or the Jencks Act."

We look forward to working cooperatively with you to ensure efficient exchanges of this and other information.

Very Truly Yours,



Daniel L. Stein

cc: Jeremy Margolis, Esq.